

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
: Plaintiff, :
: :
v. : : Criminal Action No. 07-36-GMS
: :
ANTHONY RODRIGUEZ, :
: :
Defendant. :
:

MOTION TO EXTEND TIME TO FILE PRE-TRIAL MOTIONS

Defendant, Anthony Rodriguez, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an Order enlarging the time within which pre-trial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions in this case are due by June 8, 2007.
2. Defense counsel needs additional time to conduct investigation in this case to determine what, if any, pre-trial motions should be filed. The investigation defense counsel is conducting will not be completed by the current June 8, 2007 motions deadline.
3. The defense respectfully requests an extension of time of 30 days in which to file any pre-trial motions.
4. AUSA Edmond Falgowski, counsel for the government, has no objection to defendant's motion for an extension of time in which to file pre-trial motions, making the motion unopposed.

5. The parties have agreed that any additional time given in which to file pre-trial motions will be excludable under the Speedy Trial Act.

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended until anytime after July 9, 2007.

Respectfully Submitted,

/s/
Eleni Kousoulis, Esquire
Assistant Federal Public Defender
704 King Street, Suite 110
Wilmington, Delaware 19801
(302) 573-6010
ecf_de@msn.com
Attorney for Defendant Anthony Rodriguez

Dated: June 7, 2007

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ORDER

Having considered Defendant's Motion to Extend Time to File Pre-trial Motions,

IT IS HEREBY ORDERED this _____ day of _____, 2007, that Defendant Rodriguez' pre-trial motions shall be due on the _____ day of _____, 2007.

Honorable Gregory M. Sleet
United States District Court